

WILMERHALE

February 25, 2022

Robert J. Gunther, Jr.

VIA EMAIL

+1 212 230 8830 (t)  
+1 212 230 8888 (f)  
robert.gunther@wilmerhale.com

Hon. Vernon S. Broderick  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Errant Gene Therapeutics, LLC v. Memorial Sloan Kettering Cancer Center, et al.*, C.A. No. 1:21-cv-08206-VSB

Dear Judge Broderick:

On behalf of the named defendants in the above-referenced action, Memorial Sloan Kettering Cancer Center and Sloan Kettering Institute (collectively, "Sloan Kettering"), I write pursuant to Rule 5(B) of Your Honor's Individual Rules and Practices in Civil Cases to seek leave to file, in redacted form, Sloan Kettering's Reply Memorandum of Law in Support of Defendant's Motion to Compel Arbitration and Stay Proceedings, or, in the Alternative, to Dismiss plaintiff Errant Gene Therapeutics, LLC's ("EGT") First Amended Complaint ("Reply Brief").

Sloan Kettering seeks to file in redacted form the Reply Brief, which quotes portions of EGT's Declaration of Pat Girondi (Dkt. 47-2) filed under seal, on the ground that the redactions were requested by EGT. Accordingly, Sloan Kettering has notified EGT that it must file a letter explaining the need for the redactions within three days, pursuant to Rule 5(B)(iii)(a) of Your Honor's Individual Rules and Practices in Civil Cases.

Sincerely,

/s/ Robert J. Gunther, Jr.  
Robert J. Gunther, Jr.

APPLICATION GRANTED  
SO ORDERED 

VERNON S. BRODERICK

U.S.D.J. 02/28/22

cc: Lenore Horton  
lenore@hortonlegalstrategies.com  
Wanda French-Brown  
wfrenchbrown@loeb.com  
Alexandra Cavazos  
acavazos@loeb.com  
Crystal Law

Defendants are directed to Rule 5.B. of my Individual Rules & Practices in Civil Cases and to meet and confer with Plaintiff as necessary to determine whether the Reply Memorandum of Law in Support of Defendant's Motion to Compel Arbitration and Stay Proceedings, or, in the Alternative, to Dismiss plaintiff Errant Gene Therapeutics, LLC's ("EGT") First Amended Complaint ("Reply Brief") can be filed in redacted form on ECF.

WILMERHALE

February 25, 2022

Page 2

crystallaw@loeb.com

Mary Jean Kim

mjkim@loeb.com